

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | |
|-----------------------------------|-------------------------------|
| IN RE: Kimyutta M. Carroll | BK NO. 24-14222 AMC |
| Debtor(s) | Chapter 13 |
| M&T Bank | Movant |
| vs. | Hearing Date: 02/27/25 |
| Kimyutta M. Carroll | Respondent(s) |

**OBJECTION OF M&T BANK
TO CONFIRMATION OF CHAPTER 13 PLAN**

M&T Bank (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On January 30, 2025, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$17,473.00.
2. Debtor's Plan provides for payment in the amount of \$9,412.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$8,061.00 and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, M&T Bank, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: February 11, 2025

By: /s/ Denise Carlon
Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant
bkgroup@kmllawgroup.com